

1 ALICE CHANG (SBN 239761)
2 alicechangjdmba@gmail.com
3 13048 Del Monte Dr, Apt 42F
4 Seal Beach, CA 90740
5 Telephone: (714) 507-6161

6 Rebekah L. Bailey (SBN 258551)
7 bailey@nka.com
8 NICHOLS KASTER, PLLP
9 4700 IDS Center; 80 South 8th Street
10 Minneapolis, MN 55402
11 Phone: (612) 256-3200; Fax: (612) 215-6870

12 Attorneys for Plaintiffs-Relators

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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **WESTERN DIVISION**
17

18 **UNITED STATES OF AMERICA**
19 *ex rel.* **IONM LLC**, a Delaware
20 corporation and *ex rel.* **JUSTIN**
21 **CHEONGSIATMOY, M.D.; STATE**
22 **OF CALIFORNIA** *ex rel.* **IONM**
23 **LLC**, a Delaware corporation and *ex*
24 *rel.* **JUSTIN CHEONGSIATMOY,**
25 **M.D.; LOS ANGELES COUNTY** *ex*
26 *rel.* **IONM LLC**, a Delaware
27 corporation and *ex rel.* **JUSTIN**
28 **CHEONGSIATMOY, M.D.; and**
JUSTIN CHEONGSIATMOY,
M.D., in his individual capacity,

Plaintiffs,

v.

UNIVERSITY OF SOUTHERN
CALIFORNIA, a California
corporation,

and

USC CARE MEDICAL GROUP,
INC., a California corporation,

Defendants.

Case No. 2:18-cv-08311-ODW (ASx)

DECLARATION OF
ALICE CHANG IN SUPPORT OF
APPLICATION OF NON-
RESIDENT ATTORNEY,
MATTHEW H. MORGAN, TO
APPEAR IN THIS CASE *PRO*
HAC VICE

1 I, Alice Chang, declare as follows:

2 1. I am an attorney duly licensed to practice before the Central District of
3 California. I am counsel of record for Relator IONM LLC and Plaintiff-Relator Justin
4 Cheongsiatmoy, M.D. in this action.

5 2. I submit this declaration in response to the Court's Order to Show Cause,
6 (ECF 120), and in support of the Application of non-resident attorney, Matthew H.
7 Morgan, to appear in this case *pro hac vice*. (ECF 118).

8 3. I have personal knowledge of all matters set forth herein, and if called to
9 testify thereto, could and would competently do so.

10 4. I was admitted to the State Bar of California on December 1, 2005.

11 5. I am admitted to the Bar of this Court and in good standing.

12 6. I was retained by Plaintiffs-Relators IONM LLC and Justin
13 Cheongsiatmoy, M.D. and entered my Notice of Appearance in the above-captioned
14 case on January 4, 2021. (ECF 28).

15 7. The law firm of Nichols Kaster, PLLP was subsequently retained to
16 serve as co-counsel by Plaintiff-Relators IONM LLC and Justin Cheongsiatmoy,
17 M.D. in January 2022.

18 8. On February 7, 2022, I filed an application of non-resident attorney,
19 Matthew H. Morgan, to appear in this matter *pro hac vice*. (ECF 118).

20 9. On February 10, 2022, this Court issued an Order to Show Cause. (ECF
21 No. 120).

22 10. After reviewing my admission status and personal information following
23 the issuance of the Order to Show Cause (ECF No. 120), I paid the Court's renewal
24 fee of \$25 and updated my physical address where I maintain an office within the
25 Central District of California for the practice of law, in which I am physically present
26 on a regular basis to conduct business, with the State Bar of California, the Central
27 District of California, and PACER.

28 11. I believe I currently meet all the requirements to be designated

1 sponsoring local counsel pursuant to L.R. 83-2.1.3.4.

2 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws
3 of the United States of America that the foregoing is true and correct.

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5 Dated: February 17, 2022

6 By: /s/ Alice Chang
7 Alice Chang (SBN 239761)
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